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February 27, 2008

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**By Federal Express**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 30554

Attn: Chief, Media Bureau

**Re: Castleberry Telephone Company, Inc.'s Annual 47 C.F.R. § 64.2009(e) CPNI  
Compliance Certification  
EB Docket No. 06-36**

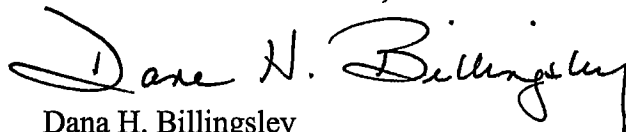
Dear Ms. Dortch:

On behalf of Castleberry Telephone Company, Inc., we submit the original and four (4) copies of the above-referenced annual CPNI Compliance Certification. We have also filed a copy of this Certification electronically in EB Docket No. 06-36 and have provided two (2) courtesy copies to the Commission's Enforcement Bureau and one (1) copy to Best Copy and Printing, Inc., as required under the Commission's Public Notice, DA 08-171 (released January 29, 2008).

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.



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Enclosure

cc: Homer Holland  
FCC Enforcement Bureau  
Best Copy and Printing, Inc.

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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

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Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 27, 2008

Name of company covered by this certification: Castleberry Telephone Company, Inc.

Form 499 Filer ID: 805914

Name of signatory: Homer Holland

Title of signatory: Secretary/Treasurer

In response to the Commission's Public Notice, DA 08-171 (released January 29, 2008), Castleberry Telephone Company, Inc. states as follows:

I, Homer Holland certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, as set forth in 47 C.F.R. §§ 64.2001, *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in sections 64.2001, *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

Signed Homer Holland

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

**ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT  
OF  
CASTLEBERRY TELEPHONE COMPANY, INC.**

**EB Docket No. 06-36**

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Castleberry Telephone Company, Inc. (hereinafter "Castleberry") files the following statement of compliance with the requirements set forth in 47 C.F.R. §§ 64.2001, *et seq.* on behalf of Castleberry:

1. I have personal knowledge that Castleberry has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.
2. I have personal knowledge that Castleberry obtains written approval for the use of its customers' CPNI and that Castleberry has notified its customers of their right to restrict Castleberry's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
3. I have personal knowledge that Castleberry has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. §§ 64.2001, *et seq.* and that Castleberry has an express disciplinary process in place to deal with breaches of CPNI.
4. I have personal knowledge that Castleberry implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
5. I have personal knowledge that Castleberry maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. Castleberry retains all such records for a minimum period of one year.
6. I have personal knowledge that Castleberry has established a supervisory review process regarding Castleberry's compliance with outbound marketing situations and that

Castleberry maintains records of such compliance for a minimum period of one year. Castleberry's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

7. I have personal knowledge that Castleberry has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

I hereby certify that the foregoing statements are true and correct.

Executed on this 22<sup>nd</sup> day of February, 2008.

CASTLEBERRY TELEPHONE COMPANY, INC.

By:

Homer Holland

Homer Holland

Secretary/Treasurer